

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

March 24, 2021

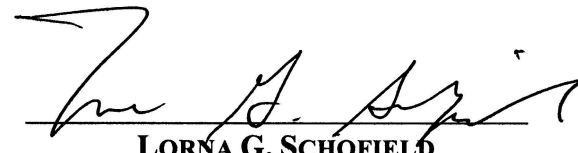
BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 60.

Dated: March 30, 2021
New York, New York

Re: United States v. Joseph Bagaglia,
19 Cr. 342 (LGS)



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I write to request a temporary modification of Mr. Bagaglia's home-detention bail condition to permit him to spend Easter with his family at his sister's house in New Jersey. His sister's address and phone number have already been provided to Pretrial Services. Mr. Bagaglia's mother, sister, brother, brother-in-law, nephews, and grandmother will be in attendance. The family is aware of Mr. Bagaglia's bail conditions and will supervise him.

Mr. Bagaglia proposes to leave his mother's home at noon on Easter Sunday, April 4, 2021, and to return by 9:00 p.m. that evening.

This request is identical to a request the Court granted for Mr. Bagaglia to spend Thanksgiving 2020 at his sister's house. Pretrial has no objection to this request, just as it had no objection to the Thanksgiving request. The government had no objection to the Thanksgiving request but now objects to this request for the reasons stated in its March 12, 2021 letter.

Respectfully submitted,

/s/

Clay H. Kaminsky
Assistant Federal Defender
Federal Defenders of New York
(212) 417-8749 / (646) 842-2622

cc: AUSAs Ni Qian and Sarah Kushner
USPTO Acheme Amali (by email)